

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:19-CR-331-BO-2

UNITED STATES OF AMERICA

v.

DAMEON SHAE ADCOCK

UNOPPOSED MOTION TO EXTEND THE  
PRETRIAL MOTIONS DEADLINE AND  
TO CONTINUE ARRAIGNMENT

The defendant, Dameon Shae Adcock, by and through counsel, hereby moves the Court to extend the deadline to file pretrial motions for thirty (30) days through and including 30 October 2019. Mr. Adcock additionally requests that the arraignment be continued accordingly. In support of this motion, Mr. Adcock states the following:

1. On 20 August 2019, Mr. Adcock was named in a nine-count Indictment charging him with conspiracy to commit acts against the United States involving passport fraud, in violation of Title 18, United States Code, Section 1542; false statements on passport application and aggravated identity theft, in violation of Title 18, United States Code, Sections 1028A(a)(1), 1028A(c), 1542, and 2; and aiding and abetting fraud and misuse of visas, permits, and other documents, security fraud, in violation of Title 42, United States Code, Section 408(a)(7)(B).
2. On 26 August 2019, the Court appointed the Office of the Federal Public Defender to represent Mr. Adcock. Defense counsel filed a Notice of Appearance on 28 August 2019.
3. Mr. Adcock appeared for his initial appearance before Magistrate Judge Robert T. Numbers on 26 August 2019. Government did not move for detention. An Order Setting Conditions of Release was issued the same day.

4. Pretrial motions are presently due no later than 30 September 2019. The arraignment for this matter is currently set for October 2019 term of court in Raleigh.
5. Undersigned counsel requires additional time to continue to review discovery with the client, research and investigate legal issues, determine what, if any, pretrial motions are appropriate, and the best way to proceed with Mr. Adcock's case. The government is still providing discovery in this matter.
6. Defense counsel respectfully requests that the pretrial motions deadline be extended thirty (30) days through and including 30 October 2019 and that the arraignment be continued accordingly..
7. Assistant United States Attorney Gabriel Diaz has been contacted and has no objection to an extension of the pretrial motions deadline and continuance of the arraignment.
8. This motion is made in good faith and not for purposes of delay. Neither the Government nor the Defendant would be prejudiced by the extension of the pretrial motions deadline or the continuance sought herein.

WHEREFORE, the Defendant respectfully requests that the deadline for filing pretrial motions be extended for at least thirty (30) days, through and including 30 October 2019 and that the arraignment in this matter be continued accordingly to a date that the Court deems appropriate. The ends of justice served by this motion outweigh the interests of the public and the Defendant in a speedy trial as set forth in Title 18 U.S.C. § 3161 (h)(7)(A).

Respectfully submitted this 27th day of September, 2019.

G. ALAN DUBOIS  
Federal Public Defender

/s/ **Edward D. Gray**  
EDWARD D. GRAY  
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N.C. State Bar No. 37539  
LR 57.1 Counsel Appointed

*CERTIFICATE OF SERVICE*

I HEREBY CERTIFY that a copy of the foregoing was served upon:

GABRIEL DIAZ  
Assistant United States Attorney  
Suite 800, Federal Building  
310 New Bern Avenue  
Raleigh, NC 27601-1461  
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by electronically filing the foregoing with the Clerk of Court on 27 September 2019, using the CM/ECF system which will send notification of such filing to the above.

This the 27th day of September, 2019.

/s/ **Edward D. Gray**  
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LR 57.1 Counsel Appointed